



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 10, 1995

Gary C. Price
Facility Manager
Morton Salt - Grantsville Operations
P.O. Box 506
Grantsville, Utah 84029-0506

Re: Comments on Notice of Tentative Approval, Morton International Inc. - Morton Salt Division, Grantsville Operations, M/045/037, Tooele County, Utah

Dear Mr. Price:

This letter is in response to Mr. Don Worthington's March 4, 1995 comment letter regarding the Division's tentative approval of the Mining and Reclamation Plan for the Morton Salt Grantsville Operations. On March 17, 1995, a site inspection was performed by Division staff in the company of yourself and Mr. Nate Tuttle of Morton Salt, and Mr. Worthington. The adjacent properties on both sides of the main intake canal were examined during this inspection. Mr. Worthington's property is north of the canal and appears to lie upgradient from the canal and the Great Salt Lake. At the time of our site inspection, we did not observe evidence of salt seepage or vegetation damage on Mr. Worthington's property that could be directly related to intake canal seepage. It was pointed out that Morton was not actively pumping water into the canal during this inspection, and therefore, it may be appropriate to visit the site sometime during active pumping.

During the inspection, Mr. Worthington indicated approximately nine acres of property associated with the canal right-of-way had been sold to one of the previous salt operators. It is believed that Morton acquired that right-of-way property as part of the purchase agreement, although documentation of this has not yet been verified.

Division and Morton staff also examined portions of the property along the south side of the canal. This property is owned by Morton and for the most part, lies down-gradient from the canal. This area did show a few areas of seepage near the canal bank and some vegetation impacts on the lake bed lands were noted. We understand this area has, at times been inundated with water from the Great Salt Lake during operations, which could explain some of the damaged vegetation. Mr. Tuttle also indicated that some of this area has been impacted by the operator's adjacent road building/maintenance activities.

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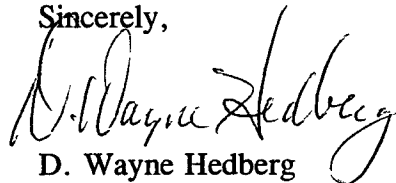
Given the nature and content of Mr. Worthington's letter, and the information gathered during the site inspection, the Division sees no reason to deny approval of Morton Salt's Mining and Reclamation Plan for the Grantsville Operations. The Division will conduct another site inspection during active pumping to further evaluate/investigate the possibility of canal salt water seepage and upgradient vegetative impacts.

As a result of the recent inspection, it has come to our attention that the main intake canal is not included in the current reclamation plan. Because this canal is above the meander line of the Great Salt Lake and out of the lake bed playa, we believe it should be backfilled with the available bank materials, regraded/contoured, and then seeded as part of final reclamation. The Division estimates reclamation of this 11,000 feet canal by regrading/backfilling with onsite materials and broadcast seeding would cost approximately \$18,770 which is 1.47% of the current surety estimate. Because this is such a minor percentage of the current total surety amount, the Division will wait until the five year surety review to adjust the surety amount accordingly.

The exclusion of the intake canal reclamation will not cause a revocation of the Division's Tentative Approval of the current Mining and Reclamation Plan; however, the plan will need to be amended within the near future to address this issue. We request that Morton amend the reclamation plan by making the appropriate text and map revisions to reflect this requirement.

Please provide a written response to this letter which amends the plan to include reclamation of the intake canal no later than May 1, 1995. We will temporarily suspend granting our final approval of the current Mining and Reclamation Plan, until we receive your response. If you have any questions in this regard, please contact me or Tony Gallegos here at the Division. Thank you and Mr. Tuttle for your cooperation and assistance during the site inspection.

Sincerely,



D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb
cc: James Carter, Director DOGM
Lowell Braxton, Associate Director, DOGM
MORTON.LET